

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION No.: 05-CV-10488-JLA

|                               |   |
|-------------------------------|---|
| TIMOTHY HILLS,                | ) |
| Plaintiff                     | ) |
|                               | ) |
| vs.                           | ) |
|                               | ) |
| TOWN OF STOUGHTON, DAVID      | ) |
| M. COHEN, INDIVIDUALLY, AND   | ) |
| MANUEL CACHOPA, INDIVIDUALLY, | ) |
| Defendants                    | ) |
|                               | ) |

**AUTOMATIC REQUIRED DISCLOSURE PURSUANT TO FED.R.CIV.P. 26(a)**  
**AND LOCAL RULE 26.2**

**NOW COMES** the Plaintiff, Timothy Hills, pursuant to Fed.R.Civ.P. 26(a) and Rule 26.2 of the Local Rules of the United States District Court for the District of Massachusetts and makes the following required disclosures:

**(A) The name and if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings, identifying the subjects of the information.**

The following are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings. Each of the following can be contacted at the following addresses and telephone numbers:

- 1) Mr. Timothy Hills, 22 Berrington Terrace, Lowell, MA, (617) 216-8771.
- 2) Sergeant David Cohen, Stoughton Police Department, Municipal Building, 10 Pearl Street, Stoughton, MA, (781) 341-1300.
- 3) Chief Manuel Cachopa, Stoughton Police Department, Municipal Building, 10 Pearl Street, Stoughton, MA, (781) 341-1300.
- 4) Mr. Peter Marinelli, address and telephone number unknown at this time.
- 5) Mr. Brian Sexton, 25 Wall Street, Canton, Massachusetts.

- 6) Ms. Kristy Kleinbauer, 55 Aldrich Road, Canton, Massachusetts.
- 7) Mr. Horst and Janice Kleinbauer, 55 Aldrich Road, Canton, Massachusetts.
- 8) Mr. Barry Abelson, Esq., 30 Penobscot Street, Stoughton, Massachusetts.
- 9) Lt. Wohlgemuth, Stoughton Police Department, Municipal Building, 10 Pearl Street, Stoughton, MA, (781) 341-1300.
- 10) Chief David Chamberlain, Stoughton Police Department, Municipal Building, 10 Pearl Street, Stoughton, MA, (781) 341-1300.
- 11) State Trooper Brian Brooks, address and telephone number unknown at this time.
- 12) Mr. George Jabour, Special Prosecutor, address and telephone number unknown at this time.
- 13) Town of Stoughton Manager, Mark Stankiewicz, Town of Stoughton, Municipal Building, 10 Pearl Street, Stoughton, MA, (781) 341-1300.
- 14) Gerald D. Goulston, Chairman of Board of Selectmen for Town of Stoughton, Municipal Building, 10 Pearl Street, Stoughton, MA, (781) 341-1300.
- 15) Sergeant Christopher Ciampa, Stoughton Police Department, Municipal Building, 10 pearl Street, Stoughton, MA, (781) 341-1300.
- 16) Former Chief Joseph Saccardo, Stoughton Police Department, Municipal Building, 10 pearl Street, Stoughton, MA, (781) 341-1300.
- 17) Lt. Blount, Stoughton Police Department, Municipal Building, 10 pearl Street, Stoughton, MA, (781) 341-1300.
- 18) Officer Brian Holmes, Stoughton Police Department, Municipal Building, 10 pearl Street, Stoughton, MA, (781) 341-1300.
- 19) James B. Lampke, Esq., 115 North Street, Hingham, Massachusetts.
- 20) Glenn Hannington, Esq., 1 Longfellow Place, Boston, Massachusetts.

**(B) A copy of, or a description by category and location of, all documents, date compilations, and tangible things in the possession, custody, control of the party that are relevant to the disputed facts alleged with particularity in the pleadings.**

Any and all documents which are the in the plaintiff's possession at this point in time, relating to this case, are protected by the attorney client privilege and/or the work product

doctrine. However, all newspaper articles in the plaintiff's possession are available to other parties, as well as, copies of any pleadings filed in this matter.

**(C) A computation of any category of damages claimed by the disclosing party:**

The plaintiff's damages resulting from this case include, but are not limited to, loss of the plaintiff's business income, humiliation, embarrassment and deprivation of his civil rights.

**(D) For inspection and copying under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a Judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the Judgment.**

Not applicable.

Timothy Hills,

By His Attorneys,

COLUCCI, COLUCCI, MARCUS &  
FLAVIN, P.C.

Date: 11/14/05

/s/ Dino M. Colucci

Dino M. Colucci, Esquire, BBO#552331  
552 Adams Street  
Milton, MA 02186  
(617) 698-6000

**CERTIFICATE OF SERVICE**

I, Dino M. Colucci, attorney for the Plaintiff, Timothy Hills, in the above-entitled action, hereby certify that on the 14<sup>th</sup> day of November, 2005, I filed this Automatic Required Disclosure Pursuant To Fed.R.Civ.P. 26(a) and Local Rule 26.2 electronically with the Court, which constitutes service under Local Rules upon the following counsel:

Charles D. Mulcahy, Esq.  
Wynn & Wynn, P.C.  
90 New State Highway  
Raynham, MA 02767

/s/ Dino M. Colucci  
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